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FACEBOOK, INC.

[REDACTED VERSION OF  
DOCUMENT(S) SOUGHT TO BE  
SEALED]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

**FACEBOOK, INC.,**

v.  
Plaintiff,

POWER VENTURES, INC. a Cayman Island corporation, STEVE VACHANI, an individual; DOE 1, d/b/a POWER.COM, DOES 2-25, inclusive.

### Defendants.

Case No. 5:08-cv-05780-LHK

**SUPPLEMENTAL DECLARATION OF  
MICHAEL R. CAPLAN IN SUPPORT OF  
FACEBOOK'S RESPONSE TO ORDER  
REGARDING BILLING RECORDS**

Dept: Courtroom 8, 4th Floor  
Judge: Hon. Lucy H. Koh

1 I, Michael R. Caplan, declare as follows:

2 1. I am the Chief Operating Officer at the law firm of Goodwin Procter LLP, counsel  
3 of record to Facebook, Inc. in the above-captioned matter. I manage the firm's business, financial  
4 and administrative operations. I make this declaration based on my personal knowledge, unless  
5 otherwise noted. If called, I can and will testify competently to the matters set forth herein.

6 2. This declaration accompanies Facebook's Response To Order Regarding Billing  
7 Records pursuant to the Court's July 28, 2017 Order Regarding Billing Records. ECF No. 464.

8 3. Facebook filed a motion for attorney's fees on May 16, 2017 seeking fees in the  
9 amount of \$146,667.84 for all proceedings after the Ninth Circuit's December 2016 remand  
10 through April 2017. ECF No. 445. Specifically related to services billed by Goodwin Procter  
11 LLP, the bill totaled \$23,745.04, reflecting the various billing rates of the attorneys and paralegal  
12 involved from December 2016, through April 2017, including a 12% discount. We are now  
13 seeking fees in the reduced amount of \$22,105.60 for Goodwin Procter LLP for a total of  
14 \$145,028.40. We have further removed \$1,639.44 of attorneys' fees related to work performed in  
15 response to Defendants' Supreme Court petition.

16 4. On July 27, 2017, the Court requested that Facebook provide "detailed billing  
17 records indicating the hours spent by each biller on each task for which Plaintiff seeks  
18 compensation" and "additional justification for their hourly rates." ECF No. 464 at 1.

19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

26 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
27 knowledge. Executed this 3<sup>rd</sup> day of August, 2017 in New York, New York.  
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Dated: August 3, 2017

Respectfully submitted,

By: /s/ Michael R. Caplan  
MICHAEL R. CAPLAN

## **ATTORNEY ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I, Neel Chatterjee, hereby attest that concurrence in the filing of this document has been obtained from any signatories indicated by a “conformed” signatures (/s/) within this document.

Dated: August 3, 2017

/s/ I. Neel Chatterjee  
I. Neel Chatterjee